

HASSARD BONNINGTON LLP  
MARC N. ZIMMERMAN, ESQ., State Bar No. 100521  
JOANNA L. STOREY, ESQ., State Bar No. 214952  
Two Embarcadero Center, Suite 1800  
San Francisco, California 94111-3941  
Telephone: (415) 288-9800  
Fax: (415) 288-9801  
Email: [jls@hassard.com](mailto:jls@hassard.com)

Attorneys for Defendants  
JOSEPH R. MATEL, M.D.  
and RICHARD FLINDERS, M.D.

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

VALERIE GEORGE, et. al.,  
  
Plaintiffs,  
  
vs.  
  
SONOMA COUNTY SHERIFF'S  
DEPARTMENT, et. al.,  
  
Defendants.

No. C-08-02675 EDL

**STIPULATION AND  
~~PROPOSED~~ ORDER  
AS MODIFIED**

Requested Hearing Date: 08-10-2010

Honorable Elizabeth D. Laporte

Third Amended Complaint Filed:  
February 24, 2009

Jury Trial Date: January 24, 2011

Defendants Joseph R. Matel, M.D. and Richard Flinders, M.D. intend to submit a motion for determination of good faith settlement. IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, pursuant to Local Rule 6-1(b), that, subject to the Court's approval, that the motion for determination of good faith settlement to be brought by defendants Joseph R. Matel, M.D. and Richard Flinders, M.D. may be heard on shortened time. The reason the parties request the shortened time for the motion is that discovery and dispositive motion deadlines are imminent. Also, the minor's compromise was only recently approved by the Court.

///

The parties further agree to the following briefing schedule:

Motion due: July 27, 2010.

Opposition due: August 3, 2010.

Reply due: August 6, 2010.

Hearing Date: Tuesday, August 10, 2010, at 2:00 p.m.

Dated: July 23, 2010

HASSARD BONNINGTON LLP

/ S / *Joanna L. Storey*

---

**Joanna L. Storey**

Attorneys for Defendants

JOSEPH R. MATEL, M.D. and RICHARD  
FLINDERS, M.D.

Dated: July 23, 2010

SANFORD WITTELS & HEISLER LLP

/ S / *(as authorized on 07/23/2010)*

---

**Steven Wittels**

Attorneys for Plaintiffs

VALERIE GEORGE, DONALD GEORGE,  
JAIDA GEORGE, and  
RYAN GEORGE, JR.

Dated: July 23, 2010

SPAULDING, MCCULLOUGH & TANSIL LLP

/ S / *(as authorized on 07/23/2010)*

---

**Terry S. Sterling**

Attorneys for Defendants

SONOMA COUNTY SHERIFF'S  
DEPARTMENT, BILL COGBILL AND  
COUNTY OF SONOMA

Dated: July 23, 2010

TRIMBLE SHERINIAN & VARANINI

/ S / *(as authorized on 07/22/2010)*

---

**Jerome M. Varanini**

Attorneys for Defendants

CALIFORNIA FORENSIC MEDICAL  
GROUP, INC., MICHAEL E. DAGEY, R.N.,  
JAMES LUDERS, M.D.

1 Dated: July 23, 2010

LAFOLLETTE JOHNSON DEHAAS

2 / S / (as authorized on 07/23/2010)

3 **Larry Byron Thornton**

Attorneys for Defendants

4 SUTTER HEALTH AND SUTTER

5 MEDICAL CENTER OF SANTA ROSA

6 Dated: July 23, 2010

ROGASKI, PREOVOLOS, WEBER & PATTERSON

7 / S / (as authorized on 07/23/2010)

8 **Ralph Andino**

Attorneys for Defendants

9 NORICK JANIAN, M.D.

10 \*\*\*\*\*

11  
12 GOOD CAUSE APPEARING THEREFOR, IT IS HEREBY ORDERED that  
13 the motion for determination of good faith settlement by defendants Joseph R. Matel, M.D.  
14 and Richard Flinders, M.D. shall be heard on shortened time with the following briefing  
15 schedule:

16 Motion due: July 27, 2010.

17 noon on August 2  
Opposition due: August 3, 2010.

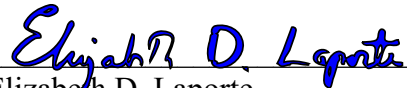
18 August 3  
Reply due: August 6, 2010.

Wednesday, August 11

19 Hearing Date: Tuesday, August 10, 2010, at 2:00 p.m.

20  
21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22  
23 Dated: July 26, 2010



Elizabeth D. Laporte

24 United States Magistrate Judge